



State of Arizona
Department of Education
Office of Diane M. Douglas
Superintendent of Public Instruction

Administrative Review Summary Report

School Food Authority Name: Mobile Elementary District

CTD: 07-03-86

Site(s): Mobile Elementary School

Contact: Dr. Kit Wood, Principal

Review Date: October 26, 2016

Review Period: September 2016

Programs Reviewed: ☒ National School Lunch ☒ School Breakfast ☐ Afterschool Snack
☐ Fresh Fruit & Vegetable ☐ Special Milk

Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
Performance Standard 1: Certification & Benefit Issuance- Critical Area		
The eligibility determined for one student was not transferred correctly to the benefit issuance document.	Discussed best practices (like having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis.	<i>Please describe the process that will be implemented to ensure that the benefit issuance document matches all current students and their eligibility status.</i>
Two selected students applications were denied incorrectly.	Discussed taking all applications at face value. Additionally, discussed procedures for verification for cause.	<i>Please provide written assurance that all income applications will be taken at face value and certified correctly.</i>
The benefit issuance document is not being updated in a timely manner to reflect changes in eligibility.	Discussed potential changes that can be made to system to ensure that updates are made in a timely manner.	<i>Please provide a written description of how updates will be made to the benefit issuance document, including the frequency that those updates are made.</i>
Performance Standard 1: Meal Counting & Claiming- Critical Area		
Meal count totals by category for the month of review were not correctly combined and recorded. This was deemed a systemic error and contributed toward fiscal action calculations.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue.	<i>Please provide a written description of changes to the system that have been implemented to ensure that meal service lines provide an accurate count by eligibility category.</i>

Performance Standard 2: Meal Components & Quantities- Critical Area

Fluid milk was not available in at least two creditable varieties for each meal service.	Discussed variety requirement and feasible options for compliance. Allowable milk varieties are Fat Free Unflavored, Fat Free Flavored, and 1% Unflavored.	<i>Please provide written assurance that fluid milk is now available in at least two varieties for each meal service.</i>
Repeat findings in quantities was observed for the review period and contributed towards fiscal action. The Corndog served 9/23 of the week of review could not be credited towards the meal pattern due to insufficient documentation. The Turkey Tacos served on 9/22 of the week of review did not meet daily meat/meat alternate requirement.	Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue (i.e. changes in serving utensils, recipes, etc.). Meal pattern requirements for the National School Lunch Program & How to Plan a Lunch Menu Power Point can be found on ADE's website at http://www.azed.gov/health-nutrition/meal-pattern/ .	<i>Please provide a written description of the changes that have been made to ensure that portion sizes meet minimum amounts required by the meal patter. Additionally, the certificate of completion for How to Plan a Lunch Menu must be submitted.</i>
The Corndog served on 9/23 of the week of review could not be credited towards the meal pattern due to insufficient documentation.	Discussed when processed products are used in Child Nutrition Programs to meet the meal pattern requirement, the products' contributions must be determined. CN Labels and/or Product Formulation Statements provide valuable crediting information; and only these will be accepted as proper crediting documentation. Guidance on Product Formulation Statements and CN Labels can be found on ADE's website under the <i>Processed Product Documentation</i> section found at http://www.azed.gov/health-nutrition/meal-pattern/ .	<i>Please provide written assurance that a product will not be credited towards the meal pattern without proper crediting documentation. Additionally, a CN label and/or Product Formulation Statement for the replacement Corndog must be provided.</i>
The Corndog and bread used for French Toast and Toasted Cheese Sandwich served for the review period did not meet whole grain rich requirements.	Discussed all grains served must meet USDA whole grain rich requirements. Whole Grain Resource for the National School Lunch and Breakfast Program: A Guide to Meeting the Whole Grain-Rich Criteria can be found on ADE's website at http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf .	<i>Please provide written assurance that only grains meeting USDA whole grain rich requirements will be served. Additionally, provide documentation for the replacement bread that meets whole grain rich requirements.</i>

Documentation did not support that all required meal components and quantities were offered and served during the review period. Daily vegetable requirement of 3/4 cup and meat/meat alternate requirement of 1oz/eq was not met on 9/22, vegetable subgroup dark green and legumes was not offered.	Discussed specific missing items and suggested changes. Vegetable Subgroup Quick Guide can be found on ADE's website at http://www.azed.gov/health-nutrition/files/2015/04/vegetable-subgroups.pdf . The 5 Day Meal Pattern for National School Lunch Program can be found on ADE's website at http://www.azed.gov/health-nutrition/files/2015/04/sy-15-schoolbreakfastprogram-5day.pdf . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 6 cents).	<i>Please provide a written description of the changes that have been made to the menu to bring it into compliance with the meal pattern requirements.</i>
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Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

Verification procedures were not followed correctly for SY15/16.	Discussed proper verification procedures. Selected one student for verification, conducted direct verification, printed ADE templates for verification tracking form and verification notification letters on the day of review. Online Training: Verification Review can be found at http://www.azed.gov/health-nutrition/files/2016/03/verification-reviewrevised-3-21-16.pdf .	<i>Please provide written assurance that verification will be conducted according to the required procedures.</i>
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Meal Access & Reimbursement: Meal Counting & Claiming

The Free and Reduced-Price Policy Statement provided by the SFA does not align with current practices and procedures observed on-site.	Discussed changes that should be made to sections B, J, P and signer of the Free and Reduced Price Policy Statement	<i>Please provide an updated and signed Free and Reduced-Price Policy Statement to your assigned ADE School Nutrition Programs Specialist.</i>
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The site and sponsor application in CNPWeb needs to be updated with current contact information for the School Food Authority/Program Contact.	Referred them to update site and sponsor application in CNPWeb, contact assigned specialist to let them know of changes. Step by Step Instruction: How to submit Site and Sponsor Application in CNPWeb can be found on ADE's website at http://www.azed.gov/health-nutrition/files/2016/09/how-to-submit-site-and-sponsor-applications-in-cnpweb_august-2016.pdf .	<i>Please provide written assurance that site and sponsor applications in ADE's CNPWeb will accurately reflect the most current practices in operation.</i>
Daily edit checks are not being conducted appropriately. The incorrect attendance factor is being used.	Discussed the importance of using the correct attendance factor in CNWeb Claims and Daily Edit Checks.	<i>Please provide written assurance that the correct attendance factor will be used for Daily Edit Checks and CNPWeb Claims.</i>

Meal Pattern & Nutritional Quality: Meal Components & Quantities

Signage which explains what constitutes a reimbursable meal for breakfast and lunch was not displayed to students.	Discussed feasible options for signage and potential content, plan for creating and posting. Printable POS Signage can be found on ADE's website at http://www.azed.gov/health-nutrition/meal-pattern/ .	<i>Please provide written assurance that signage explaining to students what constitutes a reimbursable has been displayed.</i>
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Resource Management

No findings.

General Program Compliance: Civil Rights

The non-discrimination statement used on program materials is not the most current USDA statement.	Discussed where to find non-discrimination statement on ADE's website at http://www.azed.gov/health-nutrition/civil-rights/ and whether long or short statement would be most appropriate.	<i>Please provide written assurance that all program materials have been updated with the proper language. Additionally, an updated program material with the correct non-discrimination statement must be provided to the reviewer.</i>
The USDA non-discrimination statement was not printed on appropriate program materials.	Discussed where to find non-discrimination statement on ADE's website at http://www.azed.gov/health-nutrition/civil-rights/ and whether long or short statement would be most appropriate.	<i>Please provide written assurance that all program materials have been updated with the proper language. Additionally, an updated program material with the correct non-discrimination statement must be provided to the reviewer.</i>

Procedures for receiving and processing complaints alleging discrimination within the school meal programs are not in place.	Discussed site-specific procedures for receiving and processing complaints, as well as identifying the outside agency to which complaints are forwarded (i.e., State Agency, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights). Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves nor can the SFA's complaint process be a prerequisite for accepting a complaint. Procedures for filing a complaint can be found at https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer .	<i>Please provide a written description of the process and procedures for processing complaints alleging discrimination within FNS School Meal Programs.</i>
Program staff have not been trained on civil rights topics.	Discussed requirement and how to document that requirement has been met. An acceptable civil rights power point training material can be found on ADE's website at http://www.azed.gov/health-nutrition/files/2012/01/az-civil-rights-compliance-for-staff-jan-20141.pdf .	<i>Please provide written assurance that all food service staff will be trained at hire and as needed on Civil Rights Compliance in Child Nutrition Programs. Describe the process that will be implemented to ensure that this requirement is adhered to and properly documented.</i>

General Program Compliance: Local Wellness Policy

The required stakeholders are not being permitted to be involved in the review and update of the LWP.	Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Additionally, discussed LEAs must permit participation by the general public and school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process.	<i>None required at this time.</i>
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A recent assessment of the implementation of the LWP has not been conducted.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Additionally, discussed the final rule requires LEAs must conduct an assessment of the wellness policy every 3 years, at a minimum. This assessment will determine: Compliance with the wellness policy; How the wellness policy compares to model wellness policies; Progress made in attaining the goals of the wellness policy. Sample evaluation tools can be found on ADE's website at <http://www.azed.gov/health-nutrition/wellness-policy/>.

None required at this time.

The LWP did not contain policies for food and beverage marketing.

Discussed LEAs must fully comply with the requirements of the final rule by June 30, 2017. Additionally, discussed including policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Applies to : exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing.

None required at this time.

General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

The School Nutrition Program Director did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.

Discussed 12 hour requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at <http://www.azed.gov/health-nutrition/nslp/training/>.

Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Director is registered for.

<p>The School Nutrition Program Manager did not meet the training requirements for the current school year and sufficient plans for meeting the requirements have not been developed.</p>	<p>Discussed 10 hour training requirement and feasibility for attending upcoming applicable trainings. Trainings for School Nutrition Professionals can be found on ADE's website at http://www.azed.gov/health-nutrition/nslp/training/.</p>	<p><i>Please provide the expected date that the training requirement will be met as well as the name, date, and content information of trainings that the School Nutrition Program Manager is registered for.</i></p>
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<p>Professional Standards training hours are not being tracked on an annual basis.</p>	<p>Referred to ADE's Training Tracking forms found on ADE's website at http://www.azed.gov/health-nutrition/usda-professional-standards-new/.</p>	<p><i>Please provide written assurance that Professional Standards training hours will be tracked for all School Nutrition Program staff on an annual basis. Additionally, provide a copy of the tracker that will be used.</i></p>
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

No findings.

General Program Compliance: Reporting & Recordkeeping

<p>Records documenting verification for SY15/16 were not kept on file for the minimum required 5 years. Reviewer was unable to verify if verification requirements for SY15/16 were met.</p>	<p>Discussed record keeping requirements and timeframe of 5 years.</p>	<p><i>Please provide written assurance that all documents pertaining to the school meal programs will be retained on file for at least 5 years, as is required by Arizona law, as well as your plan for ensuring that this requirement is met.</i></p>
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General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

<p>Families were not notified of the availability of the SFSP prior to the end of the school year.</p>	<p>Discussed methods of notifying families of the availability of the SFSP prior to the end of the school year and determined which was most feasible. Summer feeding locations can be found at http://www.eatwellbewell.org/ and 1(800) 5-HUNGRY.</p>	<p><i>Please provide a description of how families will be notified of the availability of the SFSP prior to the end of the school year, and written assurance that this will occur. If you do not plan to operate the SFSP and no other entities reasonably close to your school operate the SFSP, please provide a description of other community resources that will be provided to families prior to the end of the school year.</i></p>
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Other Federal Program Reviews: Afterschool Snack Program

No findings.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2017 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

No findings.

Other Federal Program Reviews: Special Milk Program

No findings.

Comments/Recommendations:

Congratulations! Mobile Elementary District has completed the Administrative Review for the 2016-2017 school year. Thank you for your hospitality during the review process. You are doing an outstanding job implementing the NSLP. It is evident that you are working hard to ensure your students are fed healthy meals.

☐ Yes- SBP ☒ No- SBP ☐ Yes- NSLP ☒ No- NSLP

Please submit corrective action response by December 12, 2106 to Jennifer DiBenedetto at 1535 W. Jefferson St, Bin #7, Phoenix, AZ 85007.

Jen DiBenedetto

11/23/2016

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the Administrative Review Appeal Procedures found in your Child Nutrition Programs Guidance Manual.



1535 West Jefferson Street, Phoenix, Arizona 85007 • (602) 542-4361 • www.azed.gov